

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

SKAT TAX REFUND SCHEME LITIGATION

This document relates to: 1:19-cv-01867-LAK, 1:19-cv-01868-LAK, 1:19-cv-01869-LAK, 1:19-cv-01895-LAK, 1:19-cv-01896-LAK, 1:19-cv-01898-LAK, 1:19-cv-01904-LAK, 1:19-cv-01865-LAK, 1:19-cv-01866-LAK, 1:19-cv-01871-LAK, 1:19-cv-01873-LAK, 1:19-cv-01894-LAK, 1:19-cv-01930-LAK, 1:19-cv-01893-LAK, 1:19-cv-01906, 1:19-cv-01911, 1:19-cv-01924, 1:19-cv-01781-LAK, 1:19-cv-01785-LAK, 1:19-cv-01791-LAK, 1:19-cv-01783-LAK, 1:19-cv-01788-LAK, 1:19-cv-01794-LAK, 1:19-cv-01798-LAK, 1:19-cv-01918-LAK, 1:19-cv-01922-LAK, 1:19-cv-01926-LAK, 1:19-cv-01928-LAK, 1:19-cv-01929-LAK, 1:19-cv-01931-LAK, 1:19-cv-01800-LAK, 1:19-cv-01803-LAK, 1:19-cv-01809-LAK, 1:19-cv-01812-LAK, 1:19-cv-01818-LAK, 1:19-cv-01792-LAK, 1:19-cv-01806-LAK, 1:19-cv-01808-LAK, 1:19-cv-01815-LAK, 1:19-cv-01870-LAK, 1:19-cv-01801-LAK, 1:19-cv-01810-LAK, 1:19-cv-01813-LAK

Master Docket 18-md-02865 (LAK)
ECF Case

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO THE COMPLAINTS**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the current May 13, 2019 deadline for Defendants in the cases enumerated in the caption to answer or file a motion in response to the Complaints is hereby extended thirty (30) days up to and including June 12, 2019.

No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants expressly reserve, any and all defenses.

This is the Defendants' first request for an extension of time to answer or otherwise respond to the Complaints.

Dated: May 3, 2019
New York, New York

/S/ Alan E. Schoenfeld
(e-signed with consent)
ALAN E. SCHOENFELD
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800

alan.schoenfeld@wilmerhale.com
*Attorney for Defendants Richard Markowitz,
Jocelyn Markowitz, Avanix Management LLC
Roth 401(K) Plan, Batavia Capital Pension
Plan, Calypso Investments Pension Plan,
Cavus Systems LLC Roth 401(K) Plan,
Hadron Industries LLC Roth 401(K) Plan,
RJM Capital Pension Plan, and Routt
Capital Pension Plan*

/S/ Sharon L. McCarthy
(e-signed with consent)
SHARON L. McCARTHY
KOSTELANETZ & FINK LLP
7 World Trade Center, 34th Fl.
New York, NY 10007
(212) 840-6866
smccarthy@kflaw.com
*Attorney for Defendants John van
Merkensteijn, III, Elizabeth van Merkensteijn,
Azalea Pension Plan, Basalt Ventures LLC
Roth 401(K) Plan, Bernina Pension Plan,
Omineca Pension Plan, Starfish Capital
Management LLC Roth 401(K) Plan, Tarvos
Pension Plan, and Voojo Productions LLC
Roth 401(K) Plan*

/S/ Michelle A. Rice
MICHELLE A. RICE
KAPLAN RICE LLP
142 West 57th Street
Suite 4A
New York, NY 10019
(212) 333-0227
mrice@kaplanrice.com
*Attorney for Defendants Joseph Herman,
David Zelman, Edwin Miller, Ronald Altbach,*

/S/ Sarah L. Cave (*e-signed with consent*)
SARAH L. CAVE
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, NY 10004
(212) 837-6000
sarah.cave@hugheshubbard.com
Attorney for Plaintiff Skatteforvaltningen

Perry Lerner, Robin Jones, Albedo Management LLC Roth 401(K) Plan, Ballast Ventures LLC Roth 401(K) Plan, Fairlie Investments LLC Roth 401(K) Plan, Bareroot Capital Investments LLC Roth 401(K) Plan, Battu Holdings LLC Roth 401K Plan, Cantata Industries LLC Roth 401(K) Plan, Dicot Technologies LLC Roth 401(K) Plan, Vanderlee Technologies Pension Plan, Cedar Hill Capital Investments LLC Roth 401(K) Plan, Fulcrum Productions LLC Roth 401(K) Plan, Green Scale Management LLC Roth 401(K) Plan, Keystone Technologies LLC Roth 401(K) Plan, Tumba Systems LLC Roth 401(K), Plan, Crucible Ventures LLC Roth 401(K) Plan, Limelight Global Productions LLC Roth 401(K) Plan, Plumrose Industries LLC Roth 401K Plan, Roadcraft Technologies LLC Roth 401(K) Plan, True Wind Investments LLC Roth 401(K) Plan, Eclouge Industry LLC Roth 401(K) Plan, First Ascent Worldwide LLC Roth 401(K) Plan, Loggerhead Services LLC Roth 401(K) Plan, PAB Facilities Global LLC Roth 401(K) Plan, Trailing Edge Productions LLC Roth 401(K) Plan, Monomer Industries LLC Roth 401(K) Plan, Pinax Holdings LLC Roth 401(K) Plan, and Sternway Logistics LLC Roth 401(K) Plan

SO ORDERED:

Hon. Lewis A. Kaplan
United States District Judge